

Aluminum Alkyls Category – Comments of Environmental Defense

(Submitted via Internet February 4, 2002)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for the Aluminum Alkyls category.

The test plan submitted by the Aluminum Alkyl's Consortium proposes to categorize 24 aluminum alkyls and also proposes that no new testing should be conducted on the proposed members. The aluminum alkyls are highly reactive chemicals used in industrial processes such as polymerization, alkylation and stereochemical syntheses. These are extraordinarily hazardous substances and their use in the workplace is regulated by OSHA. We concur with the sponsor's assertion that no mammalian tests should be conducted on this category not because they are not hazardous but simply because their vigorous reactivity with air and water means that toxicity tests are not feasible, could not be conducted in a safe manner, and would cause undue pain and distress to animals. Indeed, reactions with air or water could be explosive and lead to fires that are nearly impossible to extinguish.

Although not technically within the scope of HPV, we think it is important to note that strict safeguards are needed to protect workers where the aluminum alkyls are used, including exposure prevention strategies in case of accident. We question whether the OSHA 8 hr TWA limit of 2mg/m³ is adequate. This seems too high for such a dangerous group of substances. We also note that in the case of transport of the aluminum alkyls, extraordinary safeguards need to be in place in order to protect motorists and residents in case of an accident.

Thank you for this opportunity to comment.

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